

0040

M. A. Coonrod
Co-Op Mining Company
P.O. Box 1245
Huntington, Utah 84528

August 15, 1983

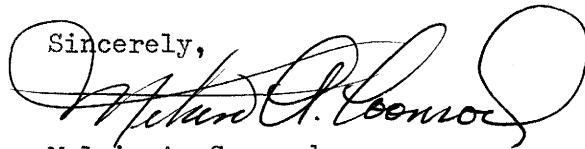
Utah Division of Oil, Gas, & Mining
Mr. John Whitehead
4241 State Office Building
Salt Lake City, Utah 84114

RE: NOV 83-5-8-3 Violation 1 of 3

Dear John:

Attached is a cursory outline of Co-Op truck load-out facility as it exists or is projected in the near future. In reviewing the violation with Mr. Owen, it appears that due to the fact the structure was indicated on the original MRP, that a separate approval was not thought necessary. I appologize for this misunderstanding and I hope this current plan will address the discrepancies which exist between what was originally submitted and what exists presently or is under construction.

Sincerely,



Melvin A. Coonrod
Permitting and Compliance Director
Co-Op Mining Company

MAC/nc

Enclosure

TRUCK LOADING FACILITY - BEAR CANYON MINE
CO-OP MINING COMPANY

SCOPE:

Co-Op Mining Company presently operates 1 of 3 conveyors indicated on the original submittal. The conveyor transfers coal from the coal storage pile area to a truck load-out. The load-out is designed to minimize fugitive dust by conveying coal to a drop chute where-in the distance of freefall into a truck is minimal.

A concrete pad to facilitate cleaning up spilled coal is located in the area immediately under the chute. Also the pad is designed to minimize adverse loading conditions during periods of inclement weather. In addition to the existing truck load-out, there is on site, a 20 ton bin which will be utilized to load oil slack coal (see fig. 1 & 2). The third load-out shown on the original submittal, is still in the conceptual stages and will be postponed until such time as engineering is complete. A copy of the engineering and or plan will be supplied to the Division for their review and approval prior to implementation.

IMPACT & MITIGATION TO THE ENVIRONMENT:

Considering the entire load-out facility is on both previously disturbed ground (old mine working - 1920), and is located within that area which was designed to remain disturbed throughout the life of the mine, all environmental safeguards were implemented prior to construction. (Reference - July 29th ACR).

ENVIRONMENTAL CONCERNS: Hydrology Resources - UMC 783.13

The report relative to drainages and sediment structure and sizing capacity done by Carolla & Horrocks for all disturbed run-off, address this area.

VEGETATION RESOURCES: UMC 783.11 & UMC 783.19

Due to the fact that the area in question was a portion of the Old Bear Creek Mine, dating back to the early 1920's and subsequently abandoned in the late 1940's, it was impossible to establish base line data.

However, based on similar areas in adjacent canyons, a reference area has been selected and evaluated and can be utilized as a standard for final reclamation.

SOIL RESOURCES: UMC 783.11 & 783.21

NO top soil was present on the site in question due to previous disturbance and subsequently none was removed. Although the Co-Op is presently committed to covering this area as well as all disturbed ground with a minimum of 6" of suitable growth media upon final reclamation.

WILDLIFE RESOURCES: UMC 783.11 & UMC 784.21

This area as well as the balance of all disturbed area within the permit area are designated as Wildlife Habitat as the principal post-mining land use. The area in question is addressed in the wildlife section of the MRP as a small portion of the total disturbance associated with the Bear Canyon Mine. The size of the actual disturbance with the load-out is so small (less than .2 acre) as not to constitute any negligible impact.

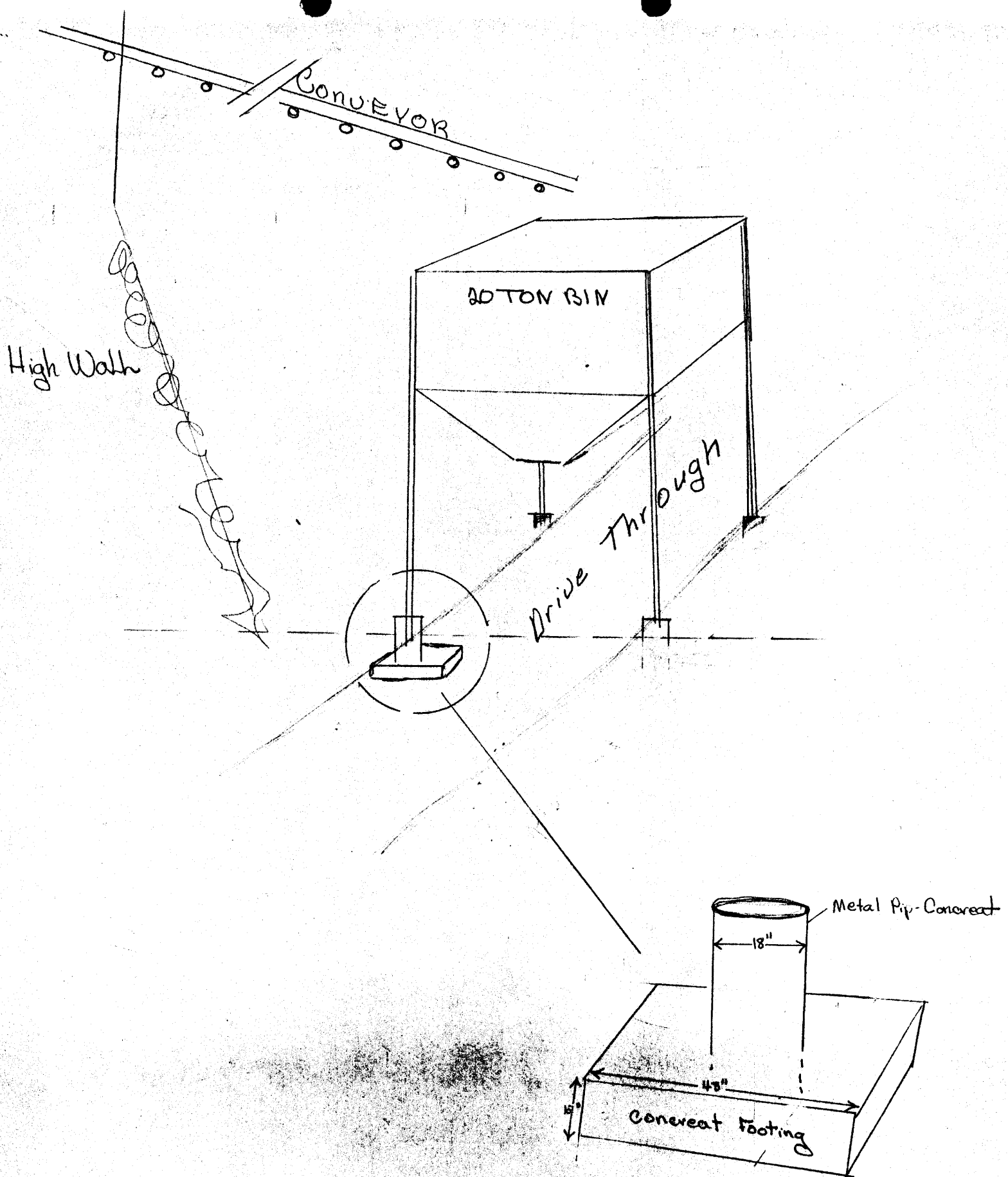
AIR POLLUTION CONTROL PLAN: UMC 784.26

See attachment A for an update of the air pollution control plan.

USE OF PUBLIC ROADS: UMC 784.18

The load-out facility is within 50' of a private road, and does not fall under this category. (See attachment 1 in Attachment A) A signed copy of the County Agreement which designates this portion of the road as private.

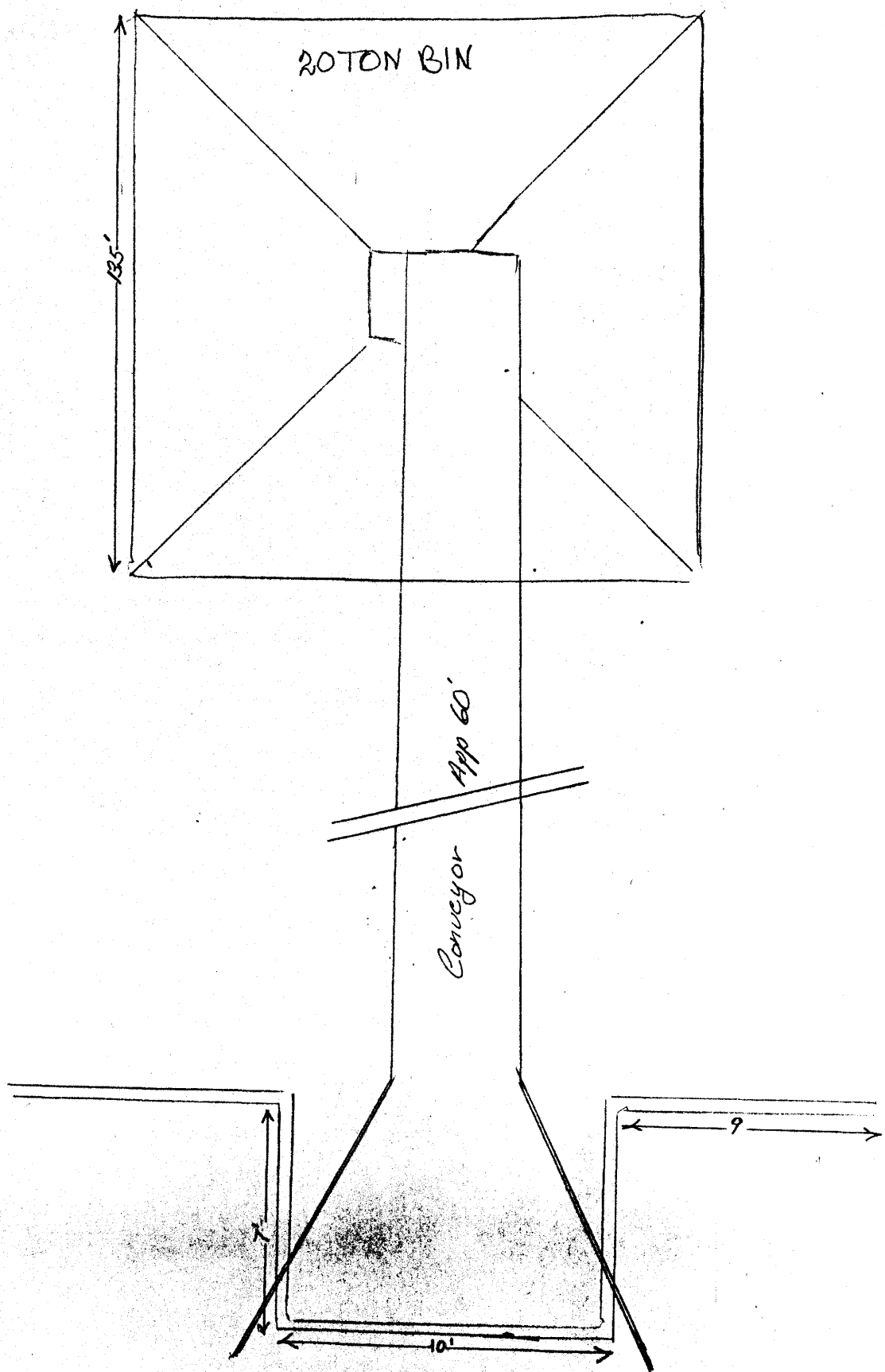
Based on all of the above plus the very nature of the minimal impact of this facility, the Co-Op urges the Divisions' cooperation in approving the existing facility and that remaining portion which was under construction prior to this issue coming to light. The sooner the facility can be completed and made operational, the quicker the necessary safeguards relative to dust control can be implemented.



CO-OP MINE

OIL SLACK LOAD OUT

Fig #4



right-of-way would be stabilized. Revegetation in accordance with the revegetation plan will occur during the first seasonal opportunity. A road grader will be used periodically to remove any spilled materials from the road bed. Vehicle speed will be limited to a maximum of 30 mph, and speed restriction signs will be posted.

Item # 3. Coal Handling Facilities

Principle sources of fugitive dust emissions related to the coal handling facilities have been identified as: (A) Conveyor, (B) Coal storage pile, (C) Crusher and Screening site, and (D) Truck load-out facilities. The proposed control measures for each of these sources are discussed below:

- A. Conveyors - Conveyors, housing the main belts from the mine portal to the run of mine coal stockpile, will have water sprays located at each transfer point (see fig. 1). In addition, the conveyor discharge drop will be minimized or have chutes installed.
- B. Coal storage pile - is normally maintained at between 8 and 10% moisture with mine run coal. In addition, the normal mode of operation for the Co-Op mine is not to maintain a storage pile for any duration, but to recycle the pile on a continual basis. Thus, minimizing the drying possibility which results from large stockpiles of long duration. However, Co-Op is committed to periodically spray the pile with water and/or a dust suppressant when and if the need arises.
- C. Crusher and Screening Site - The site is partially enclosed and will be well protected from wind. In addition, a continual water spray will be automatically activated whenever the crusher is in service.
- D. Truck Load-Out Facility - The truck load-out has been engineered to control fugitive dust. The drop has been designed to minimize free fall from the chute to the truck bed. Also, water sprays will be installed on the transfer point immediately prior to the load-out on the run of mine coal. The additional load-out which is in construction presently, is designed as an oil slack load-out, and subsequently, this coal will be treated at a rate of app. 1 gal. of oil per ton, to minimize dust during loading and future handling of this material.

Item # 4 Estimate And Control of Emissions

Storage Pile (Coal)

Average size of pile 5,000 T. (10,000 T. CAP. - Normally less than 1,000 T.)

Through put 200,000 T. per year

$$D = 9.125$$

$$s = 20$$

d = 175 (Hiawatha weather station - 151 days snow cover - 39 additional days .01 in. or more of rainfall)

$$E = .05 \cdot \frac{20}{1.5} \cdot \frac{175}{235} \cdot \frac{15}{15} \cdot \frac{9.125}{90} = .0525 \cdot 200,000 \text{ T.} = 5.25 \text{ T. per year}$$

Control - Coal is sprayed with water as it is being mined in order to meet underground dust control requirements. Additional spray equipment will be installed at the storage site to use if needed.

Crushing (primary only) 200,000 T. . .02 = 4,000# = 2 T. per year

Control - Water sprays

Screening 200,000 T. . .1 = 20,000# = 10 T. per year

Control - Bag house

Conveyors and Transfer points 200,000 T. . .2 = 40,000# = 20 T. per year

Control - Water sprays

Roads (haul) -- s = 15
S = 20
W = 190

$$E = 5 \cdot .47945 = 2.39725 @ 19333.33 \text{ miles per year} = 23.17 \text{ T. per year}$$

Control - Chemical Stabilization

Roads (access) s = 15
S = 10
W = 190

$$E = 2.5 \cdot .479452 = 1.1986 \quad \text{Miles per year} = 3.59 \text{ T. per year}$$

Control - Chemical Stabilization

Product Removal 200,000 T. per year . .05 = 5 T. per year

Control - Water spray

Item # 5. Time Table for Implementation

The Co-Op is presently in the permitting processes with U.D.O.G. & M. As each facility is approved for construction, the sprays will be implemented. (Anticipated date of completion - Nov. 30, 1983). The existing facilities are presently fitted with some spray apparatus and total outfitting should be completed by October 15th, 1983.

Reference to Department of Health letter of Feb. 2, 1983, relative to bag house: Co-Op intends to complete the water spray system in lieu of the bag house and wishes to defer construction of said bag house until such time as it may be deemed necessary.

ATTACHMENT 1

AGREEMENT

This agreement made and entered into this 3rd day of August 1983, by and between Emery County, a body corporate and politic (County), and Co-Op Mining Company, a Utah general partnership (Co-Op),

WHEREAS, there is an existing road in Emery County known as Bear Creek Road, and

WHEREAS, Co-Op requires extensive use of said road, and

WHEREAS, due to said extensive use, said road should be relocated for the health, safety and welfare of the citizens of County as well as others who may have occasion to use said road,

NOW, THEREFORE, be it agreed as follows:

1. The parties hereto agree and acknowledge that the southern 0.65 miles of the road known as Bear Creek Road is a County road. Said County road runs from State Road 31 in a northerly direction for approximately 0.65 miles to a presently existing gate. Thereafter the road is a private road.
2. That Co-Op will relocate the Bear Creek Road according to the plans and specifications prepared by the Emery County Engineer and described on the document entitled Bear Canyon County Road Relocation dated October 12, 1982.
3. Co-Op will relocate the Road according to the plans and specifications referred to above at their expense. Co-Op will reimburse County for engineering costs incurred by County concerning the preparation of said plans and specifications and site inspections up to One Thousand (\$1,000.00) Dollars.
4. Co-Op will indemnify and defend County for any damage caused, or loss incurred to or claim made by any public or private individual, firm, group, association, partnership or corporation as a result of the construction conducted to relocate Bear Creek Road. Said indemnification will continue until such time as County approves the completed roadway and accepts the construction thereof.
5. Co-Op acknowledges and accepts the easements of North Emery Water Users and Huntington City which exist in, along and across the relocate Bear Creek Road. Said easements are in existence on the ground. Co-Op's acknowledgment thereof herein recognizes and preserves said easements.
6. Co-Op agrees to encase water lines of North Emery Water Users and Huntington City in nestable corrugated pipe pursuant to plans and specifications prepared by the Emery County Engineer.

7. Co-Op agrees to allow access to other property served by the relocated Bear Creek Road. Said access shall be allowed to the owner of the property, their successor in interest or any other individual, firm, group, association, partnership or corporation who requires access due to their association with the owner or because the owner has granted permission to the individual, firm, group, association, partnership or corporation to go upon his property. Co-Op will not withhold access due to the type of activity which the then owner or his agents, employees or invitees intend or in fact conduct.

8. Co-Op will provide a completion and performance bond to Emery County upon the execution hereof in the amount of Twenty-Five Thousand (\$25,000.00) Dollars which will remain in force and effect for twelve (12) months after the date said road is accepted by County as indicated in paragraph 4 above.

9. Co-Op will provide liability insurance in an amount not less than Five Hundred Thousand (\$500,000.00) Dollars to be in force during the construction of said road. Said policy will name County as an insured.

10. Co-Op agrees to complete said road in a timely manner not to exceed eighteen (18) months from the date of this agreement. County may make demand upon the bonding company under the bond provided pursuant to paragraph 8 above and secure completion of the relocation in the event construction is not completed within the agreed upon eighteen (18) months.

11. It is further understood that any additional improvements of the relocated Bear Creek Road will be at the expense of all primary users.

12. The Co-Op agrees to reclaim that portion of the old Bear Creek Road according to the specifications and requirements of the Bureau of Land Manager (BLM).

13. That the Co-Op agrees to provide Emery County with the necessary easement agreements with the Utah Department of Transportation.

14. Co-Op acknowledges and agrees to comply with standard number 6.3.8 "Protection Zone" of the Utah State Health Drinking Water Standards as it applies to supplies of drinking water in Bear Canyon.

15. County agrees to inspect the relocated Bear Creek Road within ten (10) days after notification by Co-Op of the completion thereof. County must within five (5) working days of said inspection accept the road or notify Co-Op of any deficiencies which must be then corrected by Co-Op within the time period outlined in paragraph 10 above. Should County fail to notify Co-Op of any deficiencies within five (5) working days, the road is deemed accepted by County and the twelve (12) month period indicated in paragraph 8 above begins to run from the sixth (6th) day after inspection.

IN WITNESS WHEREOF, this agreement is executed the day and year above first written, at Castle Dale, Utah, pursuant to a resolution of the Emery County Board of Commissioners at a regularly scheduled meeting of the Board.

EMERY COUNTY, a body politic and corporate,

ATTEST

Barry A. Smith
County Clerk

By *Russ P. Ware*
Chairman of the Emery County
Board of Commissioners

IN WITNESS WHEREOF this agreement is executed at Huntington, Utah.

DATED this *3rd* day of *August*, 1983.

CO-OP MINING COMPANY, a Utah general partnership

By *B. W. Stoddard*
a General Partner

Bear Creek Mine
Fig 1

